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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF ANDREA PALLIOS
ROBERTS IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
RESPONSE TO COURT INQUIRY RE
UBER'S FAILURE TO PRODUCE
JACOBS LETTER AND EMAIL**

1 I, Andrea Pallios Roberts, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an attorney at the law firm Quinn Emanuel Urquhart & Sullivan, LLP,
4 counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth
5 in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its Response To Court Inquiry Regarding Uber’s Failure To Produce Jacobs Letter
8 And Email (the “Administrative Motion”). The Administrative Motion seeks an order sealing the
9 following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response	Highlighted in blue	Defendants
Exhibit 1 of Waymo’s Response	Highlighted in blue and green	Defendants (blue); Waymo (green)
Exhibit 2 of Waymo’s Response	Highlighted in green	Waymo
Exhibit 5 of Waymo’s Response	Entire document	Waymo
Exhibit 7 of Waymo’s Response	Entire document	Waymo & Defendants
Exhibit 8 of Waymo’s Response	Entire document	Defendants

17 3. Waymo’s Response contains or refers to trade secret and confidential business
18 information, which Waymo seeks to seal. Specifically, Exhibits 1, 2, 5 and 7 identified by Waymo in
19 the table above contain key terms and other information related to Waymo’s trade secrets and
20 confidential business information. The documents and highlighted portions listed above describe
21 information relating to the technical specifications and designs of Waymo’s trade secrets. I
22 understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable
23 as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this information would
24 give Waymo’s competitors access to information relating to the functionality of Waymo’s
25 autonomous vehicle system. The documents and highlighted portions listed above also divulge
26 confidential business information. If such information were made public, I understand that Waymo’s
27
28

1 competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to
2 only the confidential information.

3 4. Waymo's Response and Exhibits 1, 7, and 8 thereto contain information that
4 Defendants have designated as confidential and/or highly confidential.

5 5. Waymo takes no position on the merits of sealing the material designated by
6 Defendants, and expects Defendants to file one or more declarations in accordance with the Local
7 Rules.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct, and that this declaration was executed in San Francisco, California, on December 4,
10 2017.

11 By /s/ Andrea Pallios Roberts

12 Andrea Pallios Roberts

13 Attorneys for WAYMO LLC

14 **SIGNATURE ATTESTATION**

15 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
16 filing of this document has been obtained from Andrea Pallios Roberts.
17

18 /s/ Charles K. Verhoeven

19 Charles K. Verhoeven